## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA SOUTHERN DIVISION

WILLIE ABNER, et al.,	)
Plaintiffs,	)
V.	) Civil Action File No. 2:15-CV-2040-) KOB
UNITED STATES PIPE AND	
FOUNDRY COMPANY, LLC, and	) This Document Relates to All Cases
MUELLER WATER PRODUCTS, INC.	)
	)
Defendants.	)

### **JOINT MOTION TO CONTINUE**

Plaintiffs (in this, and all related cases before this Court) and Defendants United States Pipe & Foundry Company, LLC and Mueller Water Products, Inc. (collectively "Defendants") hereby jointly move this Court to continue the Court's requirement that a status report on the Parties' settlement discussions be submitted by today, April 6, 2018, until Wednesday April 11, 2018, and to further stay all proceedings in these consolidated cases until April 11, 2018 so that the Parties may continue to engage in good-faith discussions to resolve these actions. In support of this motion, the Parties state as follows:

1. On March 13, 2018, the Parties filed a Joint Motion to Stay (Doc. 149), requesting that this Court stay all deadlines for two weeks to allow time for the Parties to engage in good-faith settlement discussions.

- 2. On March 14, 2018, the Court granted the Parties' Motion and further ordered that a status report be submitted by April 3, 2018, updating this Court on the status of the settlement discussions.
- 3. On April 3, 2018, the Parties filed a Joint Motion to Continue (Doc. 151), requesting three additional days to engage in meaningful settlement discussions.
  - 4. On April 3, 2018, the Court granted the Parties' Motion.
- 5. The Parties have consulted and again agree that additional time is needed for the continuation of the meaningful settlement discussions. The Parties believe that a continuation until Wednesday, April 11, 2018 will allow sufficient time to conclude the ongoing discussions.

For the foregoing reasons, the Parties respectfully ask this Court to extend the stay as to all proceedings in these consolidated cases until April 11, 2018. For the Court's convenience, a proposed order is attached (Exhibit A).

Respectfully submitted this 6th day of April, 2018

#### /s/ Jon C. Conlin

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# **CERTIFICATE OF SERVICE**

This is to certify that I have served a copy of the within and foregoing on this the 6th day of April, 2018, by filing same with the Court's CM/ECF system, which will send notice to counsel of record as follows:

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